IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS GALVESTON DIVISION

IN RE:	§	CASE NO. 05-81357-G-13
	§	
RICHARD GORE and	§	
SYLVIA GORE	§	CHAPTER 13
DEBTOR	§	

OBJECTION TO CONFIRMATION

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, FORD MOTOR CREDIT COMPANY "FORD CREDIT", and files this its Objection To Confirmation by which it would respectfully show the Court as follows:

- 1. FORD CREDIT has a perfected security interest in a 2005 FORD F150 PICKUP TRUCK, Serial No. 1FTRW12W75KB81123. A true and correct copy of the Retail Installment Contract and Title to the vehicle evidencing the creation and perfection of FORD CREDIT's security interest in the vehicle are attached as Exhibits "A".
- The Debtor's plan proposes to value FORD CREDIT's secured claim at \$31,200.00. FORD CREDIT believes this value is unreasonably low.
- 3. Ford Credit's claim should be fully secured. The vehicle was purchased on February 12, 2005. The case was filed less than three months later. A cram down under these circumstances cannot be prepared in good faith.

WHEREFORE, PREMISES CONSIDERED, FORD CREDIT prays that confirmation of the debtor's Chapter 13 plan be denied and for all other relief, both legal and equitable to which FORD CREDIT may be entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

> R. CHRISTOPHER NAYLOR BEATRICE GREWEL